

IN THE UNITED STATES BANKRUPTCY COURT  
MIDDLE DISTRICT OF GEORGIA

In re:	*	CHAPTER 13
	*	
LESLIE McDANIEL,	*	CASE NO. 12-41231-JTL
	*	
Debtor,	*	JUDGE LANEY

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LESLIE McDANIEL, Individually and as	*	
Representative of her Bankruptcy Estate,	*	
	*	
Plaintiff,	*	ADVERSARY PROCEEDING
	*	
vs.	*	NO. 13-04013
	*	
SUNTRUST BANK, SUNTRUST	*	
MORTGAGE, INC., McCALLA	*	
RAYMER, LLC, FOXFIRE ACRES, INC.,	*	
THE UNITED STATES by and through the	*	
THE INTERNAL REVENUE SERVICE,	*	
THE STATE OF GEORGIA (Represented	*	
by the DEPARTMENT OF REVENUE), THE	*	
GROGAN GROUP, LLC d/b/a GROGAN &	*	
GROGAN, and THE COLUMBUS	*	
CONSOLIDATED GOVERNMENT,	*	
	*	
Defendants.	*	

**RESPONSE TO DEFENDANT COLUMBUS CONSOLIDATED GOVERNMENT'S**  
**MOTION TO DISMISS COMPLAINT**

COMES NOW, Plaintiff, through counsel, and responds to the Columbus Consolidated Government's Motion to Dismiss Complaint (hereinafter "Motion to Dismiss"). The Plaintiff responds that the Motion to Dismiss should be itself dismissed. A memorandum in opposition is filed herewith, and incorporated by reference.

Respectfully submitted

/s/ Fife M. Whiteside

FIFE M. WHITESIDE

Attorney for Debtor

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